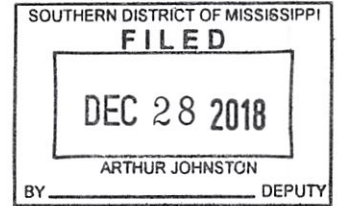


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



BOBBY L. WILLIAMS

PLAINTIFF

VERSUS

C.A. NO.: 1:18cv412 HSO-JCG

JEFFREY BARTLAM and  
SHALE SUPPORT SERVICES, LLC

DEFENDANTS

JURY TRIAL REQUESTED

---

**COMPLAINT**

---

COMES NOW the Plaintiff, Bobby L. Williams, and for cause of action against the Defendants, Jeffrey Bartlam and Shale Support Services, LLC, would show unto the Court the following facts, to-wit:

THE PARTIES

1.

Plaintiff, Bobby L. Williams, (hereinafter referred to as "**BOBBY**") is an adult resident and citizen of Pearl River County, Mississippi.

2.

The Defendant, Jeffrey Bartlam, (hereinafter referred to as "**BARTLAM**") is an adult resident and citizen of St. Tammany Parish, Louisiana, whose post office and street address is 1120 Lakeshore Boulevard, Slidell, Louisiana 70461, whereat he may be served with the process of this Court; and who, by virtue of the operation of a motor vehicle in this state, has thereby appointed as his registered agent for the service of legal process

in the event of suit against him, the Secretary of State of the State of Mississippi. See §13-3-63 of the Mississippi Code of 1972, as amended.

3.

At all times complained of herein, BARTLAM, was employed by and working for Shale Support Services, LLC and was acting in the course and scope of his employment with Shale Support Services, LLC.

4.

The Defendant, Shale Support Services, LLC, (hereinafter referred to as “**SHALE**”), is a foreign limited liability company organized and existing under the laws of the State of Louisiana, all of whose members are residents and citizens of the State of Louisiana, whose principal place of business is Lafayette, Louisiana, but which is qualified to do and is doing business in the State of Mississippi and has appointed and designated Cogency Global, Inc., 248 E. Capitol Street, Suite 840, Jackson, Mississippi 39201, as its registered agent for the service of legal process in the event of suit against it in this state.

#### JURISDICTION

5.

Jurisdiction is based on diversity of citizenship, 28 U.S.C. §1332 as the parties have complete diversity of citizenship, and the amount in controversy exceeds \$75,000.00, exclusion of interest and costs.

#### FACTS

6.

On or about November 7, 2016, at approximately 5:50 p.m., BOBBY was operating his 2004 Ford F150 pickup truck, traveling south on U. S. Highway No. 11 near and just

north of the intersection of Sam Mitchell Road and U. S. Highway No. 11 in Pearl River County, Mississippi. BOBBY was stopped with his brake lights and left turn signal on preparatory to making a left turn onto Sam Mitchell Road.. BOBBY was waiting for northbound traffic on U. S. Highway No. 11 to clear the intersection before he turned, when suddenly and without any warning, BARTLAM, who was driving a 2014 Toyota Tundra pickup truck in a southerly direction on U. S. Highway No. 11 behind BOBBY, negligently failed to stop without warning or operational necessity, and negligently collided with the rear of BOBBY's truck while traveling at a high and dangerous rate of speed under the circumstances. The posted speed limit at the time of this casualty was 35 m.p.h. BARTLAM was driving in excess of the posted speed limit, approximately 55 m.p.h. at the time of impact. BOBBY's truck was crushed and pushed forward approximately 45 feet into the ditch on the east side of U. S. Highway No. 11. BOBBY's vehicle was severely damaged and was a total loss.

7.

The negligence of the BARTLAM and SHALE, as aforesaid, was the proximate cause or proximate contributing cause of the damages and injuries sustained by BOBBY, without any negligence on the part of BOBBY, contributing thereto.

8.

BARTLAM and SHALE, were negligent in some or all of the following particulars, among others, that may be shown at the trial thereof:

- A. In failing to keep his vehicle under free and easy control;
- B. In failing to keep a proper lookout;

- C. In speeding approximately 20 miles over the posted speed limit;
- D. All other acts of negligence as may be shown at the trial hereof.

9.

As a direct and proximate result of the negligence of BARTLAM and SHALE, BOBBY was caused to suffer serious, permanent, painful and disabling injuries, including herniated disks in his lumbar spine.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Bobby L. Williams, brings this civil action to recover for all damages of every kind and nature to which he may be entitled and demands judgment against the Defendants, Jeffrey Bartlam and Shale Support Services, LLC, as follows:

- A. For compensatory damages in an amount reasonable under the circumstances of this cause in excess of the minimum jurisdictional amount for medical expenses, past and future;
- B. For loss of wages and wage-earning capacity;
- C. For pain, suffering and mental anguish, past and future;
- D. For costs and other expenses incurred by the Plaintiff, Bobby L. Williams, together with interest thereon from the date of judicial demand until paid.

Plaintiff finally prays for trial by jury on all issues contained herein.

Plaintiff reserves the right to amend its complaint upon completion of discovery.

Respectfully submitted on this, the 28 day of December, 2018.

BOBBY L. WILLIAMS, PLAINTIFF

By:   
E. BRAGG WILLIAMS, III - MSB #7234  
Of Counsel for Plaintiff

E. BRAGG WILLIAMS, III - MSB #7234  
WILLIAMS, WILLIAMS & MONTGOMERY, P. A.  
109 WEST ERLANGER STREET  
P. O. BOX 113  
POPLARVILLE, MISSISSIPPI 39470  
TELEPHONE: (601) 795-4572  
TELEFAX: (601) 795-8382  
EMAIL: [braggwilliams@wwmlawfirm.net](mailto:braggwilliams@wwmlawfirm.net)  
*Attorney for Plaintiff, Bobby L. Williams*

PLEASE SERVE THE DEFENDANTS:

JEFFREY BARTLAM  
1120 LAKESHORE BOULEVARD  
SLIDELL, LOUISIANA 70461  
Through the SECRETARY OF STATE  
STATE OF MISSISSIPPI  
125 SOUTH CONGRESS STREET  
JACKSON, MISSISSIPPI 39205

SHALE SUPPORT SERVICES, LLC  
A foreign Limited Liability Company  
Through its registered agent  
COGENCY GLOBAL, INC.  
248 E. CAPITOL STREET, SUITE 840  
JACKSON, MISSISSIPPI 39201